

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
DOMINIQUE DEMONCHAUX,

Plaintiff,

-against-

UNITEDHEALTHCARE OXFORD AND  
OXFORD HEALTH PLANS (NY), INC.,

Defendants.  
-----X

Civ. Act. No.: 10 CIV. 4491 (DAB)

**DECLARATION OF  
SHELLEY LACROIX**

DOCUMENT  
ELECTRONICALLY FILED

SHELLEY LACROIX, pursuant to 28 U.S.C. §1746(2), declares under penalty of perjury the following:

1. I am an employee of United HealthCare Services, Inc. as a Claims Supervisor. As part of my duties, I am responsible for resolving claims issues, including the Defendant, Oxford Health Plans (NY), Inc. ("Oxford"). As Claims Supervisor, I review the records related to claims for benefits regularly created and maintained by Oxford and its parent and related companies in the regular course and scope of their business. As such, I am personally familiar with the pertinent facts of this matter based on my experience in this position and my review of Oxford's records.

2. This Declaration is respectfully submitted in support of Oxford's motion for summary judgment.

3. Annexed hereto as **Exhibit "C"** are true and correct copies of Plaintiff's administrative claim file kept and maintained by Oxford in the normal and ordinary course of its business, which consists of the following:

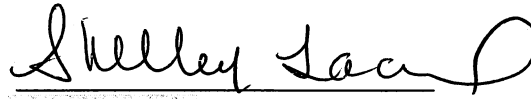
(a) Oxford's PULSE Individual Authorization Reports (DEMONCHAUX 000166 to DEMONCHAUX 000198);

(b) Billing and payment invoices (DEMONCHAUX 000199 to DEMONCHAUX 000233);

(c) Communications Events (DEMONCHAUX 000234 to DEMONCHAUX 000274);

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 26, 2011

A handwritten signature in black ink, appearing to read "Shelley Lacroix", written over a horizontal line.

Shelley Lacroix

**CERTIFICATE OF SERVICE**

I, BETSY D. BAYDALA, hereby certify and affirm that a true and correct copy of the attached **DECLARATION OF SHELLEY LACROIX** was served **via ECF and regular mail** on this 1st day of September, 2011, upon the following:

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***Attorneys for Plaintiff***  
***DOMINIQUE DEMONCHAUX***

Dated: New York, New York  
September 1, 2011

s/  
BETSY D. BAYDALA (BB 5165)